

Sarah Shapero (Bar No. 286748)
Jessica Adair (Bar No. 238364)
SHAPERO LAW FIRM
100 Pine St., Ste. 530
San Francisco, CA 94111
Telephone: (415)273-3504
Facsimile: (415)273-3508

Attorneys for Plaintiffs,
KEN DARKE
NATAÑA DARKE

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

KEN DARKE, an individual, NATAÑA
DARKE, an individual;
Plaintiffs,

v.

LOANCARE, LLC, a limited liability company,
CLEAR RECON CORP, a stock corporation,
and DOES 1-50, inclusive,
Defendants.

Case No. 3:23-cv-04151-WHA

**STIPULATION TO DISMISS CASE
WITH PREJUDICE PURSUANT TO
Fed R. Civ. P. 41(a)(1)**

STIPULATION

1. Whereas on July 20, 2023, Plaintiffs commenced this action by filing their initial Complaint with Contra Costa County Superior Court.

2. Whereas on August 15, 2023, Defendant LoanCare, LLC removed the action to this Court. (ECF No. 1.)

3. Whereas on October 10, 2023, Defendant LoanCare, LLC, Answered the Complaint. (ECF No. 28.)

4. Whereas Defendant Clear Recon Corp. has not entered an appearance.

5. Whereas the Parties have settled the matter.

6. WHEREAS, pursuant to Fed R. Civ. P. 41(a)(1), the Plaintiff may dismiss an action without a court order by filing a stipulation of dismissal signed by all parties who have appeared;

1 7. WHEREAS, the Voluntary Dismissal will be with prejudice;

2 8. NOW THEREFORE, it is hereby stipulated and agreed by and between Plaintiff and
3 Defendant, by and through their respective counsel, that Plaintiff will voluntarily dismiss this entire
4 action against Answering Defendant LoanCare, LLC and Non-Answering Defendant Clear Recon
5 Corp. with prejudice.

6 **IT IS SO STIPULATED.**

7
8 DATED: November 3, 2023

SHAPERO LAW FIRM

9
10 BY: /s/ Sarah Shapero

Sarah Shapero

Jessica Adair

Attorneys for Plaintiffs,

11 KEN DARKE

12 NATANA DARKE

13
14
15 DATED: November 3, 2023

HOLLAND & KNIGHT LLP

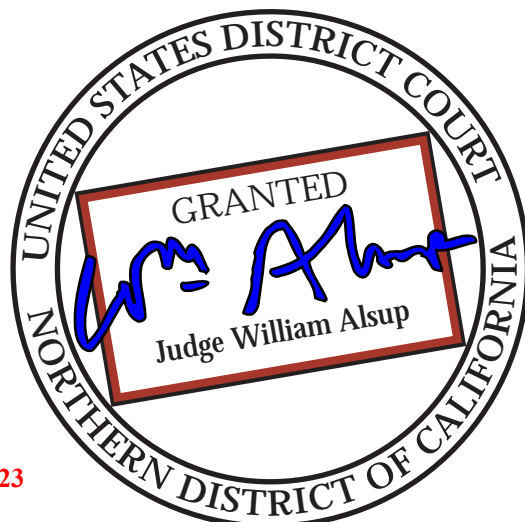
16 BY: /s/ Zachary C. Frampton

Zachary C. Frampton

Andrew Klair

Attorneys for Defendant

17 LOANCARE, LLC



Dated: November 7, 2023